

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**



Cutting Edge Vision, LLC

vs.

Case No.: 6:22-cv-00285-ADAS

TCL Technology Group Corporation, TCL Electronics  
Holdings Limited, TCL Communication Technology  
Holdings Limited, and TCL Communication Limited

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Michael F. Heafey, applicant herein, and  
moves this Court to grant admission to the United States District Court for the Western District of  
Texas pro hac vice to represent TCL Technology Group Corporation, TCL Electronics  
Holdings Limited, TCL Communication Technology in this case, and  
Holdings Limited, and TCL Communication Limited  
would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)

Rimon. P.C. with offices at:

Mailing address: 800 Oak Grove Avenue, Suite 250

City, State, Zip Code: Menlo Park, California 94025

Telephone: 650-461-4433

Facsimile: 650-461-4433

2. Since 06/18/1991, Applicant has been and presently is a  
member of and in good standing with the Bar of the State of California.  
Applicant's bar license number is 153499.

3. Applicant has been admitted to practice before the following courts:

Court:

U.S. Court of Appeals, 9th Circuit

USDC Central Dist. of CA

USDC Eastern Dist. of CA

USDC Northern Dist. of CA

USDC Southern Dist. of CA

Dist. of Massachusetts

U.S. Court of Appeals, Federal Circuit

U.S. Supreme Court

Supreme Judicial Court of Massachusetts

Admission date:

04/14/1997

01/10/2008

01/27/1997

08/23/1993

11/24/1997

03/29/1991

12/02/1996

05/06/2011

12/13/1990

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

5. I ☐ have ☒ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: \_\_\_\_\_ on the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

N/A

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Mark D. Siegmund; Cherry Johnson Siegmund James, PLLC

Mailing address: 400 Austin Ave., 9th Floor

City, State, Zip Code: Waco, TX 76701

Telephone: 254-732-2242

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-l(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of

Michael F. Heafey to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Michael F. Heafey

[printed name of Applicant]

/s/ Michael F. Heafey

[signature of Applicant]

### CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 24th day of July, 2023.

Michael F. Heafey

[printed name of Applicant]

Michael F. Heafey

[signature of Applicant]